## Law Offices of

## Donald J. Yannella

A Professional Corporation

Email: nynjcrimlawyer@gmail.com

Tel: (212) 226-2883 Fax: (646) 430-8379

70 Grand Avenue, Suite 100 River Edge, NJ 07661 233 Broadway, Suite 2370 New York, NY 10279 (Preferred mailing address)

March 8, 2022

Hon. Valerie E. Caproni United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

Re: United States v. Fabio Younes Arboleda and Armando Gomez

18 Cr 262 (VEC)

Hon. Valerie Caproni:

I am counsel for Fabio Simon Younes Arboleda, who is scheduled to appear at a status conference on March 14, 2022.

I respectfully request that two of my client's daughters, Paola Younes and Kathryn Younes, be permitted to visit with my client at the courthouse, either before or after the court appearance on March 14, 2022. Social visits are suspended at the Westchester County Jail, and even when they could visit, it was a "window visit" that made communication difficult. Paola Younes and Kathryn Younes are travelling from Florida to attend this court appearance.

AUSA Jason Richman informs me that the Government takes no position on this application.

Sincerely,

/s/

Donald J. Yannella, Esq.